



February 29, 2008  
Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

RE: **Inmate Calling Solutions, LLC d/b/a ICSolutions - 2007 CPNI Certification**  
Filing  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 29, 2008, enclosed for filing please is the 2007 Annual CPNI Compliance Certification submitted on behalf of Inmate Calling Solutions d/b/a ICSolutions, as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton  
Consultant to Combined Public Communications, Inc.

RN/ks

cc: Best Copy and Printing - [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM)  
FCC Enforcement Bureau (provided via ECFS website)  
Suzanne Haffner - ICS  
file: ICS - FCC  
tms: FCCx0801

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year:     **2007**

Name of company covered by this certification:                 **Inmate Calling Solutions, LLC d/b/a  
ICSolutions**

Form 499 Filer ID:   **824136**

Name of signatory:   **Brendan Philbin**

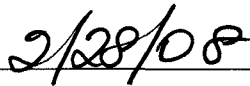
Title of signatory:   **Chief Operating Officer**

I, **Brendan Philbin**, certify and state that:

1.     I am the **Chief Operating Officer** of **Inmate Calling Solutions, LLC d/b/a ICSolutions** and, acting as an agent of the company, I have personal knowledge of **Inmate Calling Solutions, LLC d/b/a ICSolutions'** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2.     I hereby certify that, to the best of my knowledge, information and belief, **Inmate Calling Solutions, LLC d/b/a ICSolutions'** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3.     Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



Brendan Philbin, Chief Operating Officer  
Inmate Calling Solutions, LLC d/b/a ICSolutions



Date

**Statement of CPNI Procedures and Compliance  
For 2007  
Inmate Calling Solutions, LLC d/b/a ICSolutions**

Inmate Calling Solutions, LLC operates solely as an inmate service provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship. We do not have any information that relates to the quantity, technical configuration, type, or location of the customer's service. Because the service is provided outside of any presubscribed service relationship, we do not obtain any CPNI that can be used for marketing purposes. Calls are either billed by the local exchange carrier service the customer or provided on a prepaid basis only.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

We have processes in place to safeguard call detail information from improper use or disclosure by employees, and to discover and protect against attempts by third parties to gain unauthorized access to call detail. We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the caller provides date and time of the call and we can verify it against our records. The called party's local phone company bills collect calls and has its own controls for disclosure and access to this information.

For called parties who establish a prepaid account, we attempt to obtain customer name, address, and phone number to be called. We attempt to obtain this information at the request of law enforcement personnel. We do not validate this information in any way.

All our contracts with correctional facilities specify that call detail is the sole property of the correctional facility and that we must only disclose or allow access to this data by a) authorized correctional facility personnel, b) paying party for billing purposes, or c) ICSolutions technical support personnel for the purpose of technical support and billing support purposes only. Correctional Facility Personnel and ICSolutions personnel must have a valid user ID and password in order to access this data at any time. Correctional facility personnel are assigned User IDs and passwords to enable controlled access to call detail records and recordings for inmate calls placed from the facility with which they are associated. This access authorization is handled on-site by the highest level facility personnel. The administrator at each location will also establish and manage the process for any lost password replacement. The system provides for a password expiration which forces users to modify their password every x number of days for added security.

Any other requests for call detail by outside parties are referred to designated management personnel at the correctional facilities who, by virtue of their ownership, and whose responsibility it is to release the information to the appropriate legal authorities according to their own procedures. Should we ever be required provide call records ourselves, we would do so only subject to subpoena, and records will be kept in accordance with the applicable rules.

As an inmate services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2007, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

Due to the nature of the inmate calling services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.